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January 29, 2019

Via ECF
Honorable Nelson S. Roman
United States District Judge
300 Quarropas St., Rm. 218
White Plains, NY 10601

Re: **United States of America v. Willie Sims**
Ind. No: 19 Cr. 857 (NSR) – 01

Dear Judge Roman:

I represent Mr. Sims in a pending Indictment charging him with a Narcotics
Conspiracy and other related drug charges. He is presently remanded at the West
Chester County Jail in Valhalla. He has been incarcerated since his arrest on
October 3, 2019. Presently the case is in a discovery posture, and we are due back
in Court on February 12, 2020 for a status conference.

I was recently informed that, sadly, Mr. Sims's sister, Dorothy, passed away.
She was Mr. Sims's oldest sister, and only in her early fifties. Dorothy's funeral will
occur on Monday, February 3, 2020 at the Mount Lebanon Baptist Church, located
at 648 Harrison Ave, Peekskill, NY. I am told that the viewing is scheduled to
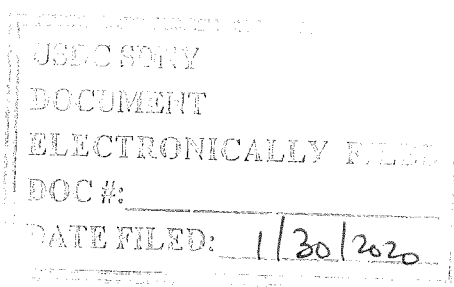begin at 9 am and the service will begin at 10 am.

Mr. Sims has asked me to request that Your Honor modify his remand status,
and Order that he be temporary released to attend Dorothy's funeral on Monday.
Specifically, I respectfully request that the US Marshalls take Mr. Sims from West
Chester County Jail at 6 am on Monday, escort him to the funeral, and return him
no later than 1 pm.

I have spoken the government about my request and they oppose.

The Court is truly sympathetic to Mr.
Sims for the passing of his sister but
the application must be denied. Clerk
of the Court requested to terminate the
motion (doc. 35). Dated: Jan. 30, 2020

SO ORDERED:

HON. NELSON S. ROMAN
UNITED STATES DISTRICT JUDGE

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 1/30/2020

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Thank you for your consideration and attention to this request.

Very Truly Yours,

SULLIVAN & BRILL, LLP

By: Steven Brill, Esq.